

**UNITED STATES BANKRUPTCY COURT FOR
THE EASTERN DISTRICT OF PENNSYLVANIA (Philadelphia)**

IN RE:	:	CHAPTER 11
	:	
LYM DEVELOPMENT, LLC	:	Bankruptcy No.: 23-11435-pmm
	:	
Debtor	:	

WITHDRAWAL AND NOTICE OF APPEARANCE

TO THE CLERK OF COURT:

Kindly withdraw the appearance of Leona Mogavero, Esquire, Subchapter V Trustee (in the above-captioned case and remove from the CM/ECF mailing list.

Kindly enter the appearance of Leona Mogavero, Esquire as Subchapter V Trustee and take notice that the undersigned hereby requests, pursuant to Rule 9010(b) of the Federal Rule of Bankruptcy Procedure (the "Rule"); and, pursuant to Rules 2002 and 9001 of the Federal Rules of Bankruptcy Procedure and 11 U.S.C. § 342, that copies of all notices and pleadings given or filed in this case be given and served upon the party listed below at the following address and telephone number:

Leona Mogavero, Esquire
Zarwin, Baum, DeVito,
Kaplan, Schaer & Toddy, P.C.
One Commerce Square
2005 Market Street, 16th Floor
Philadelphia, PA 19103-7042
Telephone: 215.569.2800
lmogavero@zarwin.com
Subchapter V Trustee

Please take further notice that the foregoing request includes not only the notice and papers referred to in the Rules specified above, but also includes, without limitation, any order, notice, application, complaint, demand, motion, petition, pleading, or request, whether formal or informal,

written or oral, and whether transmitted or conveyed by mail, delivery, telephone, telegraph, telex, or otherwise filed or made with regard to the referenced case and proceeding herein.

This Notice of Appearance and Request for Service of Papers, and any subsequent appearance, pleading, claim, or suit, shall not be deemed or construed to be waiver of the Subchapter V Trustee's right (i) to have final orders in non-core matters entered only after de novo review by a district judge, (ii) to trial by jury in any proceeding so triable herein or in any case, controversy or proceeding related hereto, (iii) to have the reference withdrawn by the United States District Court in any matter subject to mandatory or discretionary withdrawal, or (iv) other rights, claims, actions, defenses, setoffs or recoupments to which Subchapter V Trustee is or may be entitled, in law, or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments Subchapter V Trustee expressly reserves.

Respectfully submitted,

Dated: September 19, 2023

/s/ Leona Mogavero
Leona Mogavero, Esquire
Friedman Schuman, P.C.
275 Commerce Drive, Suite 210
Fort Washington, PA 19034
Telephone: (215)635-7200
Facsimile: (215) 635-7212
LMogavero@fsalaw.com
Subchapter V Trustee

Respectfully submitted,

Dated: September 19, 2023

/s/ Leona Mogavero
Leona Mogavero, Esquire
Zarwin, Baum, DeVito,
Kaplan, Schaer & Toddy, P.C.
One Commerce Square

2005 Market Street, 16th Floor
Philadelphia, PA 19103-7042
Telephone: 215.569.2800
lmogavero@zarwin.com
Subchapter V Trustee